

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

vs.

AMANDA JARRELL

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: NO. 2:11-CR-000523

**DEFENDANT, AMANDA JARRELL'S MOTION FOR
CONTINUANCE OF TRIAL DATE**

Amanda Jarrell, by her attorney, Erik B. Jensen, Esquire hereby moves to continue the trial for the reasons stated below:

1. On or about September 29, 2011, Ms. Jarrell was arraigned before the Honorable Thomas J. Reuter and entered a plea of not guilty to the instant indictment.
2. Moving counsel, Erik B. Jensen, entered his appearance on behalf of defendant on October 6, 2011.
3. A trial date has been scheduled for January 4, 2012.
4. Defense counsel is out of the country on a pre-arranged trip and will not return until on or after January 7, 2011. A continuance of not less than ninety days is respectfully requested.
5. Defense counsel stipulates that the time from the filing of this motion until the next trial listing is excludable time pursuant to 18 U.S.C. § 3161 (h) (8).
6. Assistant United States Attorney, Zane David Memeger, has no objection to this motion.

WHEREFORE, the defense motion should be granted.

/s/ Erik B. Jensen,
ERIK B. JENSEN, ESQUIRE
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Tel: 215-546-4700
Fax: 215-546-7440

Dated: December 20, 2011

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ORDER

And now, this _____ day of _____, 2011, upon consideration of the Defendant, Amanda Jarrell's Motion for Continuance of Trial Date, it is hereby **ORDERED** that the motion is **GRANTED**. The Court finds that the defense needs additional time to prepare for trial so it can effectively represent the defendant. Pursuant to 18 U.S.C. § 3161 (h) (8), the Court finds that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Trial of this matter should begin on the _____ day of _____, _____.

BY THE COURT:

THE HONORABLE C. DARNELL JONES, II